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October 18, 2021

FILED VIA ECF

Honorable Paul A. Crotty
United States District Court
500 Pearl Street
New York, NY 10007

Re: In re: Energetic Tank, Inc.
S.D.N.Y. 1:18-cv-01359 (PAC)

11/8/21
No ordered
Paul A. Crotty
USDC

Dear Judge Crotty:

We represent Petitioner Energetic Tank, Inc. in this matter. Pursuant to the terms of the Stipulated Protective Order Regarding Confidential Information and the Stipulated Supplemental Protective Order Regarding Confidential Information (ECF Nos. 114, 140), Petitioner respectfully moves the Court for leave to file under seal documents containing confidential and export information.

Petitioner moves for leave to file under seal the following documents: (a) Petitioner's Pre-Trial Brief; (b) Petitioner's Proposed Findings of Fact; and (c) Petitioner's Proposed Conclusions of Law. Each of these documents contain confidential information that may be subject to U.S. export laws and regulations, the International Traffic in Arms Regulation ("ITAR"), 22 C.F.R. § 120, et seq., and National Defense Information (NDI) within the meaning of 18 U.S.C. § 793(d) and (f) and are subject to the Stipulated Protective Orders Regarding Confidential Information (ECF Nos. 114 and 140). The Supplemental Protective Order Regarding Confidential Information requires that export documentation be maintained under seal by the Court. (ECF No. 140, ¶ 17). Petitioner requests that documents (a) – (c) remain under seal through the closure of this case.

WHEREFORE, Petitioner respectfully moves for leave to file under seal documents (a) – (c) because they contain confidential information subject to Protective Orders. No party will be prejudiced by the relief sought herein.

Respectfully submitted,

Thomas H. Belknap, Jr.

Cc: All counsel (via ECF)